

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

NICK VINCENT FLOR,

Plaintiff,

v.

Cause No. 1:20-cv-00027-JAP-LF

**THE UNIVERSITY OF NEW MEXICO,
a public university, CAMILLE CAREY,
individually and in her official capacity,
ANGELA CATENA, individually and
un her official capacity, SARA M.
CLIFFE, individually and in her official
capacity, and EVA CHAVEZ,**

Defendants.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF NICK FLOR'S FIRST SET OF REQUESTS FOR
PRODUCTION**

Defendant the University of New Mexico (“UNM”), by and through its attorneys, Conklin, Woodcock & Ziegler, P.C. (Alisa Wigley-DeLara), moves this Court for an Order for an extension of time to serve responses to Plaintiff Nick Flor’s First Set of Requests for Production served on July 15, 2020.

1. On July 15, 2020 Plaintiff’s served their First Set of Requests for Production to Defendant University of New Mexico. *See Certificate of Service (Doc. 59)*¹.
2. Responses to these discovery requests is currently due August 14, 2020.
3. Because the Plaintiff has been permitted to file an amendment of his pleading in the Memorandum Opinion and Order granting Defendants’ Motion to Dismiss (Doc. 64) , and Plaintiff

¹The Certificate of Service indicates that Plaintiff served Interrogatories to Defendant. Counsel has confirmed that only Requests for Production were served on July 15, 2020.

has confirmed his intent to file such an amendment, Defendant seeks an extension to respond to the served discovery requests to September 14, 2020.

4. Plaintiff, through counsel Nicholas T. Hart, does not oppose this motion.

WHEREFORE, Defendant respectfully requests this Court to grant the Motion for Extension of time to Respond to Plaintiff Nick Flor's First Set of Requests for Production, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

CONKLIN, WOODCOCK & ZIEGLER, P.C.

By: /s/ Alisa Wigley-DeLara
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Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was e-filed and served via email upon counsel of record on this 18th day of August, 2020.

/s/ Alisa Wigley-DeLara
Alisa Wigley-DeLara